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Heritage Impact Statement

Former National Mutual Life Association Building (H0036)

389-399 Collins Street and 59-69 Queen Street, Melbourne

Prepared for

Shakespeare Property Group Pty
Ltd

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1. Project overview

1.1 Introduction

This Heritage Impact Statement (HIS) has been prepared on behalf of Shakespeare Property Group Pty Ltd in support of an application for a heritage permit for the Former National Mutual Life Association Building to establish a disability accessible entrance to the lower ground floor level from Queens Street and the modification to vaults in the basement.

The Former National Mutual Life Association Building is of state and local significance. It is included on the Victorian Heritage Register as H0036 and the Melbourne Planning Scheme Heritage Overlay as HO605.

1.1.1 Background

Project scope

The Former National Mutual Life Association Building is currently used as a commercial property, with varying degrees of occupancy across the building. Tenancy 2 on the lower ground floor and the vaults below are not currently tenanted.

The building does not comply with the Disability Discrimination Act 1992 (DDA). Both the main Collins Street entrance and the rear Queen Street entrance comprise stairs and are therefore not accessible by people with a disability. Further, the existing lift in the rear Queen Street part of the building does not service the lower ground floor or basement levels. These levels can only be accessed via stairs. Additionally, the Queen Street foyer currently poses a safety hazard as the landing does not provide sufficient wheelchair turning space and the existing ramp over the foyer stairs has a gradient steeper than that specified in AS 1428.1-2009.

A potential tenant is seeking to lease part of the lower ground floor tenancy and existing basement vaults. However, as these spaces do not provide a DDA compliant accessible path of travel from the street to the tenancy, modifications to the building are required to ensure DDA compliance and enable leasing of the spaces.

Disability Discrimination Act 1992

The Disability Discrimination Act 1992 (DDA) is a Commonwealth legislation that makes it unlawful to discriminate against a person, in many areas of public life, including employment, education, getting or using services and accessing public places, because of their disability. The objectives of the Act are:

- (a) to eliminate, as far as possible, discrimination against persons on the ground of disability in the areas of:
 - (i) work, accommodation, education, access to premises, clubs and sport; and
 - (ii) the provision of goods, facilities, services and land; and
 - (iii) existing laws; and
 - (iv) the administration of Commonwealth laws and programs; and
- (b) to ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community; and
- (c) to promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.

Division 2A – Disability standards of the Act details that the Minister may impart disability standards in relation to any area in which it is unlawful under this Part for a person to discriminate against another person on the ground of a disability of the other person.

For the purposes of building designs and architecture the Australian Standard AS1428.1-2009 – Design for access and mobility applies and has been developed by the Australian Standards Committee ME-064, Access for People with Disabilities.

The objective of this Standard is to provide building designers and users (architects, property owners and regulators) with the minimum design requirements for building work to enable access for people with disabilities. This standard is referenced in the Building Code of Australia (formerly BCA now the National Construction Code NCC) and Disability Access to Premises—Buildings, and has been used in determining solutions for the refurbishment works detailed in this HIS.

1.1.2 Documents for approval

The following documents are included for review and endorsement:

- GENERAL
 - 24055.00.00 - GENERAL NOTES
 - 24055.00.01 - SITE PLAN
- ENTRANCE RAMP
 - 24055.01.01 - EXISTING/DEMOLITION PLAN-SECTIONS
 - 24055.01.02 - PROPOSED PLANS-SECTIONS
- VAULTS AIRLOCKS
 - 24055.02.01 - EXISTING/DEMOLITION PLAN-SECTIONS
 - 24055.02.02 - PROPOSED PLANS-SECTIONS

1.1.3 Supporting documents

The following supporting documents area included for review:

- S&H Engineering drawings:
 - SH-SK-1-1/4 - CONCEPT STRUCTURAL DESIGN - NEW OPENING
 - SH-SK-1-2/4 - PRELIMINARY INVASIVE INVESTIGATIONS FOR NEW OPENING BETWEEN STAIR AND TENANCY 02
 - SH-SK-1-3/4 - PRELIMINARY INVASIVE INVESTIGATIONS FOR NEW OPENING BETWEEN VAULTS
 - SH-SK-1-4/4 - INDICATIVE NEW RAMP DESIGN



Figure 1
The subject site as viewed from the corner of Collins and Queens Streets, indicating location of main Collins Street entrance (right) and Queen Street entrance (left).

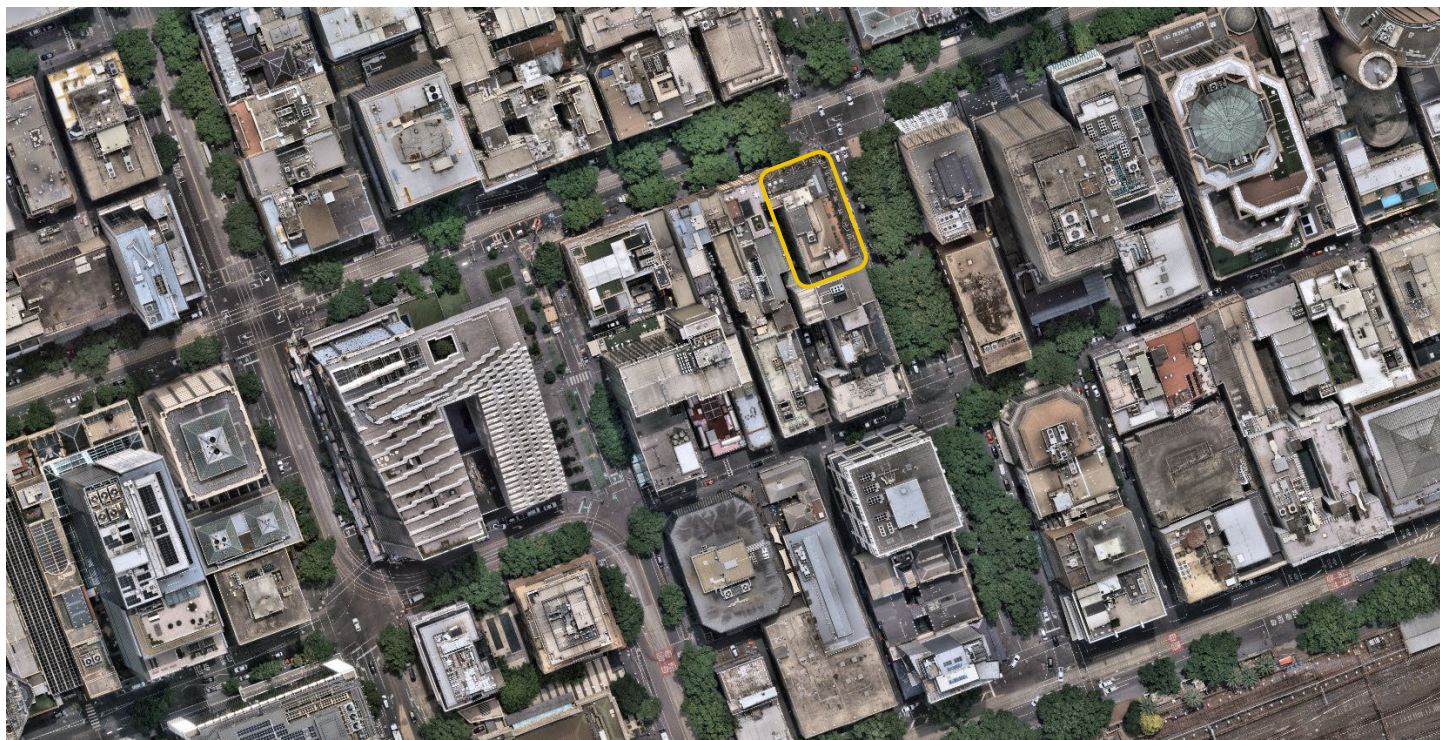


Figure 2

Aerial Image indicating location of the subject site at 395 Collins Street, Melbourne in yellow. Source: Nearmap.

1.2 The subject site

The subject site is located at 395 Collins Street, Melbourne, on the southwest corner of Collins and Queen Streets.

Standard Parcel Identifier: 1\TP849713.

For the purposes of this HIS, the subject site is limited to where the proposed works will occur, specifically the Queen Street entrance foyer, the adjacent Tenancy 2 on the lower ground floor, and the basement vaults on the floor below.

The subject site is the former National Mutual Life Association Building comprising a nine storey gothic revival building positioned with a slender tower on its north eastern corner. Constructed of Hawkesbury Bay (NSW) sandstone on a grey granite plinth, the building echoes many of the gothic revival details and motifs found in ANZ Gothic Bank (H0034) - its counterpart on the diagonally opposing corner of the Queens and Collins Streets intersection.

The building is now occupied by a various number of tenants and much of the interior is highly altered with most levels of the office block retaining little by way of decoration or historic fabric.

The ground floor interior accessed off of Collins Street through several granite steps contains the original chambers, foyer clad in various colour marbles and front office lined in decorative timbers (now a tearooms). These spaces retain much of the building's high quality gothic revival flair. Other spaces have over time been adapted and altered. The rear entrance is altogether utilitarian, but retains details of the 1903 stair case and some marble wall panelling.

The proposed works are limited to interior spaces within the rear and basement levels of the building and result in only minor changes to the external appearance of the Queen Street entrance.

1.2.1 Description

NMLA building

The former NMLA building was constructed in two stages in the Federation Gothic style with a heavily moulded facade of beige freestone on a brick and concrete structure. The first, in 1891 by Robert Gamlin, was designed by Wright, Reed & Beaver. It comprises the Collins Street and three bays of the Queens Street facades, which are accessed via the Collins Street. The remainder was erected in 1903 and is access via Queen Street.

There are deep recessed arches and projecting oriels climbing the façade, a corner tower, and fine moulding and freestone material.

The Collins Street entry foyer has been fitted out with marble details and the ceiling is an undecorated rib and panel vault. Inside the main chamber, the ceiling is fully ornamented and consists of a plaster beam and panel system on large freestanding Corinthian columns. The office spaces of the 1891 section retain their plaster decoration and timber moulding around openings.

Subject site

The rear 1903 section of the building is accessed via its Queen Street entrance at 59-65 Queen Street. The Queen Street entrance is modest in comparison to the highly decorative main Collins Street entrance. At the Queen Street entrance is a single step, which currently creates a trip hazard. The entrance doors swing inwards, with the right panel as the main leaf for entry.

The ground floor Queen Street entry foyer is lined with original marble panelling. The inward swinging entrance doors open against the interior walls, covering the marble panelling on the righthand side of the foyer and entrance to a storage/cleaning cupboard on the lefthand side of the foyer. Modifications to this space include the provision of a non-complaint ramp over the righthand side of the entry stairs to align with the main leaf door opening. However, it is noted that this arrangement is unsafe for wheelchairs or people with mobility aids due to the narrowness of the entrance landing and the steep gradient of the ramp. Other alterations to the foyer include an opening on the western wall of the lower foyer area, through the marble panelling, to provide access to the lower ground floor.

Tenancy 2 is located on the northeast side of the building on the lower ground floor and has been heavily modified over the years. While it retains its original interior support columns, the remainder of the interior space comprises the previous tenants fit out, complete with modern wall partitions and seating along the eastern and southern walls.

The basement level contains the original vaults and is not a public space. The vaults can only be access via stairs and are only accessed by their respective tenants. Proposed works are contained to Vault 1 and Vault 2. The basement level has also been heavily modified through the introduction of services, specifically fire protection services, air-conditioning ducts, and lighting to the ceiling. Anterooms to each vault have been created by the introduction of partition walls and doors. Bike racks and lockers have been installed in Vault 1, and a compactus unit in Vault 2. The existing vault doors are also non-original.



Figure 3
Queen Street entrance.

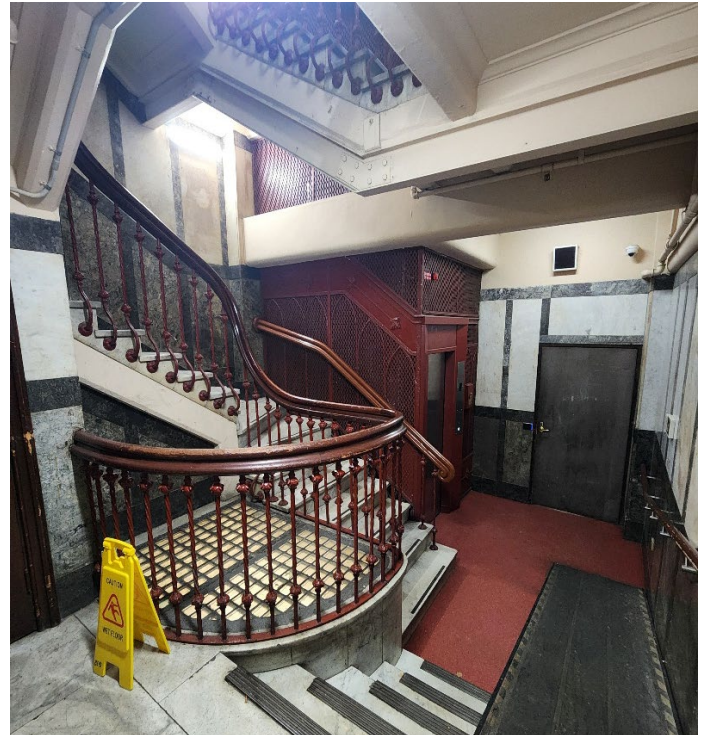


Figure 4
Queen Street entrance foyer, showing non-compliant ram and corresponding introduced door opening.

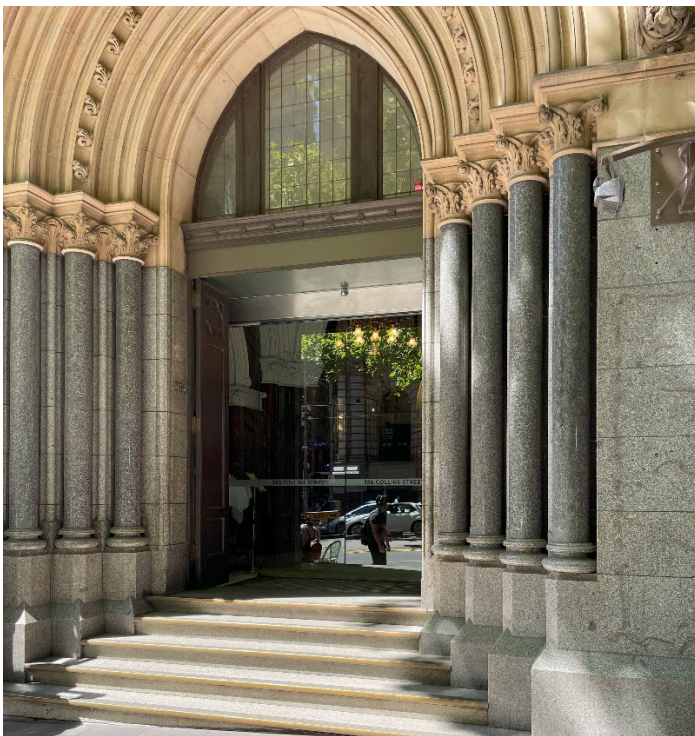


Figure 5
Collins Street entrance.



Figure 6
Collins Street entrance foyer, noting intactness of aesthetic treatments.



Figure 7
Queen Street entrance foyer showing entrance doors.



Figure 8
Lower ground floor windows as viewed from Queen Street – note interior cannot be seen from outside of building.

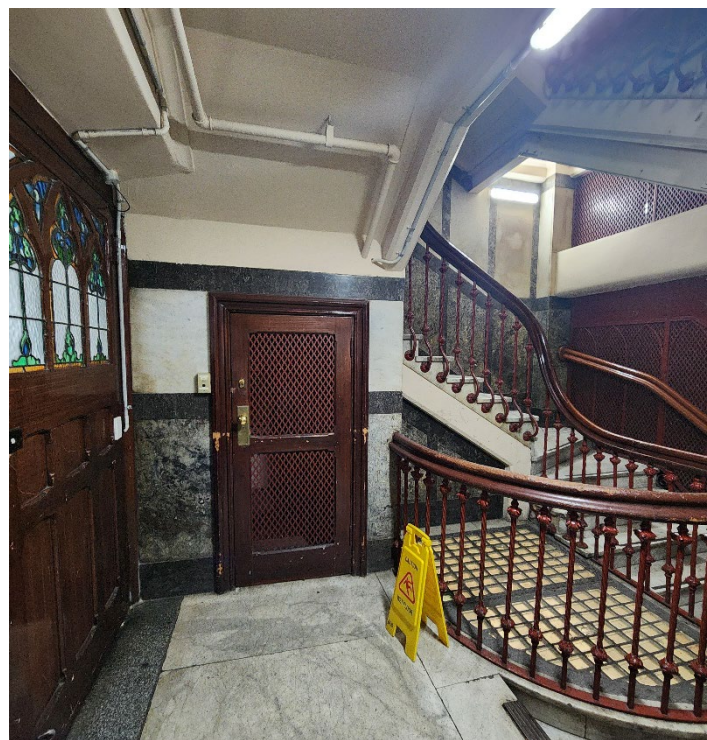


Figure 9
Queen Street entrance foyer showing existing non-compliant access ramp and door opening to lower ground floor.



Figure 10
Queen street foyer from lower landing, showing northern wall adjoining Tenancy 2.

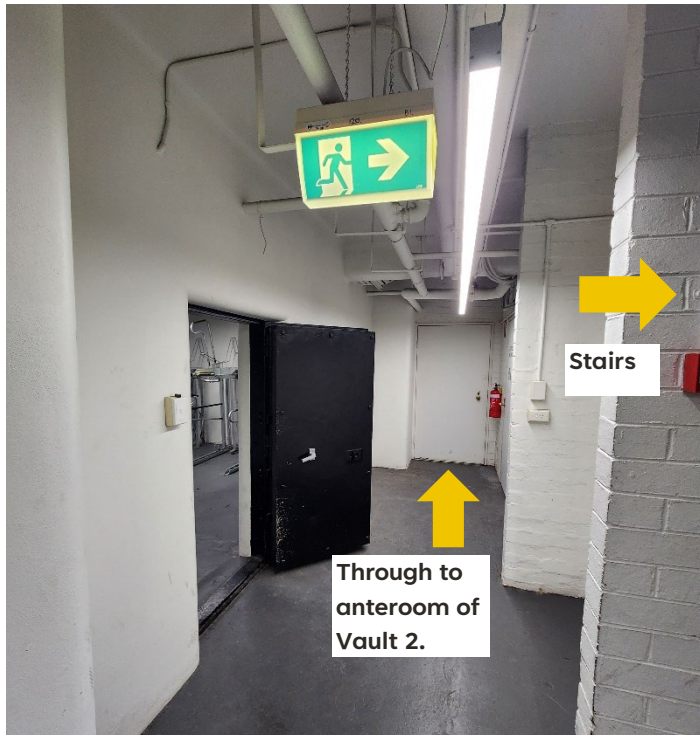


Figure 11
Vault 1 exterior, showing existing door, stair access and adjoining doorway to anteroom of Vault 2.

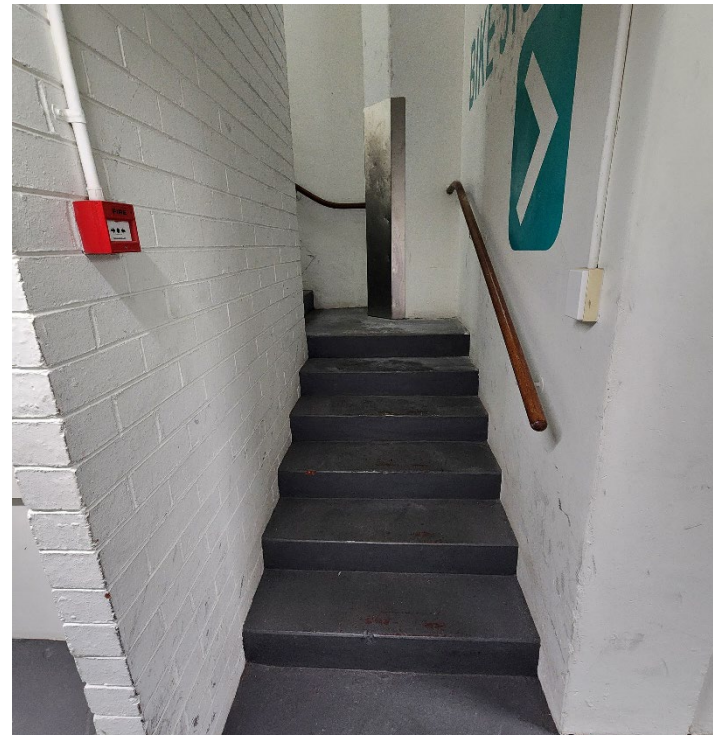


Figure 12
Stairs to basement vaults.



Figure 13
Vault 1 interior, showing services to ceiling, bike racks and lockers.

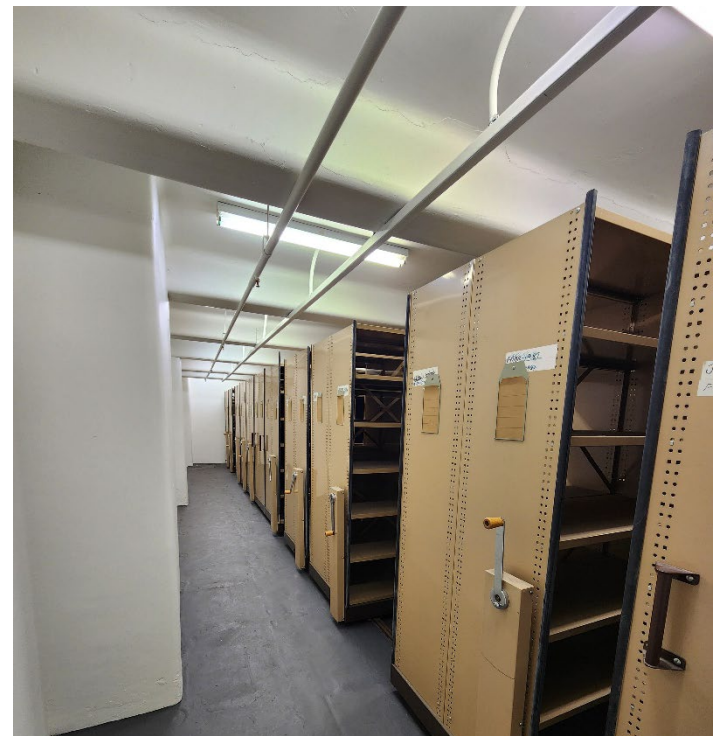


Figure 14
Vault 2 interior, showing compactus.

2. Heritage considerations

2.1 Overview

Name	Authority	Identifier	Statutory Controls
Statutory Controls Apply			
Former National Mutual Life Association Building	Victorian Heritage Register	H0036	Yes
Former National Mutual Life Association Building	Melbourne Planning Scheme	HO605	Yes, superseded by listing on the VHR
389-399 Collins Street	Victorian Heritage Inventory	H7822-1790	Yes
Non-statutory listings			
Former National Mutual Building	National Trust of Australia (Victoria)	B0251	No
Goode House	Register of the National Estate	5003	No

2.2 Statutory controls

The following statutory controls apply to the subject site.

2.2.1 Victorian Heritage Register

The subject site is listed on the Victorian Heritage Register (VHR) as H0036, Former National Mutual Life Association Building, and includes the following extent of registration:

Former National Mutual Life Association Building, 389-399 Collins Street and 56-69 Queen Street, Melbourne, Melbourne City Council.

EXTENT:

All the building known as the Former National Mutual Life Association Building marked B1 on Diagram 36 held by the Executive Director.

2. All the land marked L1 on Diagram 36 held by the Executive Director, being the land described in Certificate of Title Vol. 6085 Fol. 972.

Dated: 3 February 2000.

RAY TONKIN
Executive Director

[Victoria Government Gazette G 6 10 February 2000 p.222-223]

This registration is subject to the provisions of the Heritage Act 2017, and a permit is required to undertake works on the site – including the interior and exterior of the building and all the land that forms the extent of registration for the place.

Permit exemptions

The Citation for H0036 includes the following site-specific exemptions from heritage permits:

General Conditions:

- 1. All exempted alterations are to be planned and carried out in a manner which prevents damage to the fabric of the registered place or object.*
- 2. Should it become apparent during further inspection or the carrying out of alterations that original or previously hidden or inaccessible details of the place or object are revealed which relate to the significance of the place or object, then the exemption covering such alteration shall cease and the Executive Director shall be notified as soon as possible.*
- 3. If there is a conservation policy and plan approved by the Executive Director, all works shall be in accordance with it.*

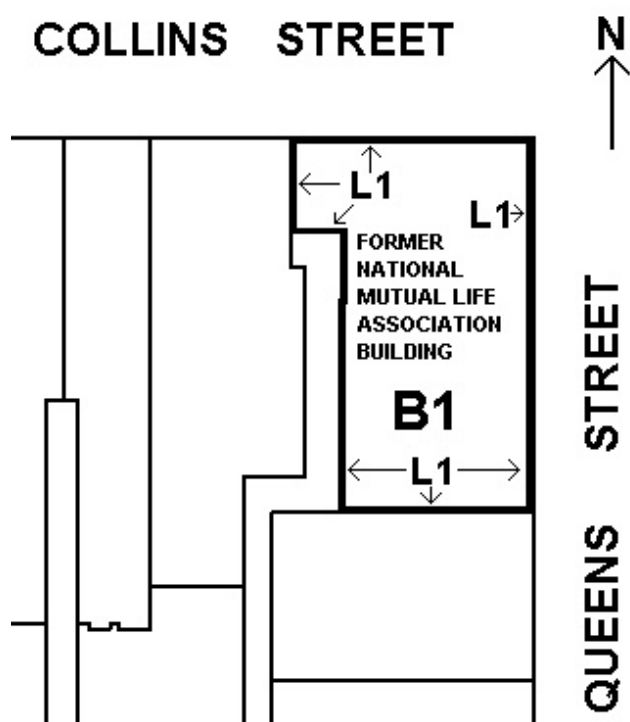


Figure 15
VHR extent of registration.

4. Nothing in this declaration prevents the Executive Director from amending or rescinding all or any of the permit exemptions.

Nothing in this declaration exempts owners or their agents from the responsibility to seek relevant planning or building permits from the responsible authority where applicable.

Exterior:

- * Minor repairs and maintenance which replace like with like.

- * Removal of any extraneous items such as air conditioners, pipe work, ducting, wiring, antennae, aerals etc, and making good.

- * Installation or repair of damp-proofing by either injection method or grouted pocket method.

Interior:

- * Minor repairs and maintenance that replace like with like.

- * Painting of previously painted walls and ceilings provided that preparation or painting does not remove evidence of the original paint or other decorative scheme.

- * Removal of paint from originally unpainted or oiled joinery, doors, architraves, skirtings and decorative strapping.

- * Installation, removal or replacement of carpets and/or flexible floor coverings.

- * Installation, removal or replacement of curtain track, rods, blinds and other window dressings.

- * Installation, removal or replacement of hooks, nails and other devices for the hanging of mirrors, paintings and other wall mounted artworks.

- * Refurbishment of bathrooms, toilets including removal, installation or replacement of sanitary fixtures and associated piping, mirrors, wall and floor coverings.

** Installation, removal or replacement of kitchen benches and fixtures including sinks, stoves, ovens, refrigerators, dishwashers etc and associated plumbing and wiring.*

** Installation, removal or replacement of ducted, hydronic or concealed radiant type heating provided that the installation does not damage existing skirtings and architraves and provided that the location of the heating unit is concealed from view.*

** Installation, removal or replacement of electrical wiring provided that all new wiring is fully concealed and any original light switches, pull cords, push buttons or power outlets are retained in-situ. Note: if wiring original to the place was carried in timber conduits then the conduits should remain in-situ.*

** Installation, removal or replacement of bulk insulation in the roof space.*

** Installation, removal or replacement of smoke detectors.*

The proposed works are not exempt works. Therefore, a permit is required from Heritage Victoria prior to the proposed works proceeding.

2.2.2 Melbourne Planning Scheme

The subject site is individually identified in the Schedule to the Heritage Overlay of the City of Melbourne Planning Scheme as HO605, Former National Mutual Life Association Building. This listing mirrors that of the VHR extent of registration.

The provisions of Clause 43.01 – Heritage Overlay in the City of Melbourne Planning Scheme is superseded by the inclusion of the Heritage Place on the Victorian Heritage Register under the Heritage Act 2017 in accordance with Clause 43.01-2 of the Planning Scheme. The Executive Director, Heritage Victoria may refer the application to the responsible municipality.

2.2.3 Victorian Heritage Inventory

The subject site is included on the Victorian Heritage Inventory as H7822-1790, for its potential to contain historical archaeological remains associated with the settlement and growth of early Melbourne.

Under the provisions of the Heritage Act 2017, a consent or consent exemption from Heritage Victoria is required to disturb any historical archaeological site in Victoria. However, as the proposed works are limited to the interior of the building these provisions do not apply in this instance.

2.3 Non-statutory listings

The following non-statutory listings apply to the subject site. The non-statutory listings recognise the heritage value of the subject site but provide no statutory protection or controls.

2.3.1 National Trust of Australia (Victoria)

The subject site is classified by the National Trust of Australia (Victoria) as Property No. B0251, Former National Mutual Building.

2.3.2 Register of the National Estate

The subject site is included on the Register of the National Estate as Place ID 5003, Goode House.

The Register of the National Estate was closed in 2007 and is no longer a statutory list. All references to the Register of the National Estate were removed from the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) on 19 February 2012.

2.4 Significance

The place has three Statements of Significance associated with its various heritage registrations. These statements are consistent in their findings and highlight the historical, architectural, aesthetical and social significance of the place. Most notably, the building is a fine example of Federation Gothic style building and retains many of its interior and exterior architectural features.

Primarily, these values are associated with the 1893 building, which internally is far more ornate in its design than the later 1903 section, to which the proposed works are contained. While both the lower ground floor and basement vaults of the 1903 section of the building contain original features, these are limited. The spaces have been heavily modified to support the ongoing use of the building and should be considered as contributory to the overall significance of the building. Additionally, the private nature of the basement vault space and its lack of aesthetic detailing, mean this space is likely to be of historical significance only.

2.4.1 Victorian Heritage Register

The following Statement of Significance for H0036 is taken from the VHR Citation.

What is significant?

The National Mutual Life Association was established in 1869 starting a new era in the business of life assurance. The company's first offices were in the Market Buildings on the corner of Collins and Market Streets, Melbourne. In 1881 the company took its first steps towards having a building of its own when a small site on the corner of Collins and Queen Streets was purchased and later the adjacent property with a frontage to Collins Street was also purchased. When the leases of the offices in the new blocks had expired, a competition was held for designs of a proposed new building. Forty-three competition entries were received with the design of architectural firm Wright Reed and Beaver of Adelaide selected. Tenders for the new building were called in August 1890 and Robert Gamlin was selected as the contractor. The foundation stone of the building was laid 28 July 1891 and the building was completed in March 1893. This 1893 building comprises the Collins Street facade and three bays of the Queen Street facade. When an opportunity arose to purchase the property in Queen Street adjacent to the Head Office building it was gladly accepted. The remainder of the building which extends down Queens Street was erected in 1903 and designed in a similar style to the earlier section. The former NMLA building is constructed in the Federation Gothic style with a heavily moulded facade of beige freestone on a brick and concrete structure. The entry foyer has been fitted out with marble details and the main foyer ceiling is an undecorated rib and panel vault. Inside the main chamber, the ceiling is fully ornamented and consists of a plaster beam and panel system on large freestanding Corinthian columns. The office spaces of the 1893 section retain their plaster decoration and timber moulding around openings.

How is it significant?

The former National Mutual Life Association Building is of social, historical, aesthetic and architectural importance to the State of Victoria.

Why is it significant?

The former National Mutual Life Association Building is of aesthetic and architectural importance as a fine example of a Federation Gothic style building. The exterior facade contains many features distinctive to the style such as exuberant modelling, a turret, parapeted gables and masonry mullions. It has interiors to match, with features such as exotic dados of grey marble, red marble pilasters and columns, and white marble stairs in the foyer. The interior also features an elaborate banking chamber with a fully ornamented ceiling. The former National Mutual Life Association Building is of aesthetic importance as it is located diagonally opposite William Wardell's ES & A Bank, William Pitt's Melbourne Stock Exchange and Melbourne Safe Deposit Building, the building completes this precinct's homage to the mercantile associations that became attached to multi-storey Gothic Revival structures of the late 19th century.

The former National Mutual Life Association Building is of social and historical importance for its association with the establishment of financial institutions in Victoria. The establishment of NMLA in 1869 began a new era in Life Assurance in Victoria, with new policies and benefits not offered before in Australia. The building is of historical importance for its representation of the boom period in Melbourne. It was constructed at the peak of the land boom and opened just before the financial crash of 1893.

2.4.2 National Trust of Australia (Victoria)

The following Statement of Significance for Property No. B0251 is taken from the Citation.

What is significant? The National Mutual Life Association was established in 1869 starting a new era in the business of life assurance. The company's first offices were in the Market Buildings on the corner of Collins and Market Streets, Melbourne. In 1881 the company took its first steps towards having a building of its own when a small site on the corner of Collins and Queen Streets was purchased and later the adjacent property with a frontage to Collins Street was also purchased. When the leases of the offices in the new blocks had expired, a competition was held for designs of a

proposed new building. Forty-three competition entries were received with the design of architectural firm Wright Reed and Beaver of Adelaide selected. Tenders for the new building were called in August 1890 and Robert Gamlin was selected as the contractor. The foundation stone of the building was laid 28 July 1891 and the building was completed in March 1893. This 1893 building comprises the Collins Street facade and three bays of the Queen Street facade. When an opportunity arose to purchase the property in Queen Street adjacent to the Head Office building it was gladly accepted. The remainder of the building which extends down Queens Street was erected in 1903 and designed in a similar style to the earlier section. The former NMLA building is constructed in the Federation Gothic style with a heavily moulded facade of beige freestone on a brick and concrete structure. The entry foyer has been fitted out with marble details and the main foyer ceiling is an undecorated rib and panel vault. Inside the main chamber, the ceiling is fully ornamented and consists of a plaster beam and panel system on large freestanding Corinthian columns. The office spaces of the 1893 section retain their plaster decoration and timber moulding around openings.

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that became attached to multi-storey Gothic Revival structures of the late 19th century.

The former National Mutual Life Association Building is of social and historical importance for its association with the establishment of financial institutions in Victoria. The establishment of NMLA in 1869 began a new era in Life Assurance in Victoria, with new policies and benefits not offered before in Australia. The building is of historical importance for its representation of the boom period in Melbourne. It was constructed at the peak of the land boom and opened just before the financial crash of 1893.

Adopted from V.H.R. Citation: 12/03/2013

Classified: 'Local' 21/06/1973

Revised: 03/08/1998

2.4.3 Register of the National Estate

The following Statement of Significance for Place ID 5003 is taken from the Citation.

This is one of the finest Gothic Revival buildings in Victoria. The composition with deep recessed arches and projecting oriels climbing the facade is unique. The corner tower, fine mouldings and Freestone facing material are special features which enhance this composition. The superb vestibule and ground floor offices and chamber are of special significance. The building is a focal point of an exceptional group of nineteenth century banks and offices around the Collins and Queen Street intersection.

(The Commission is in the process of developing and/or upgrading official statements for places listed prior to 1991. The above data was mainly provided by the nominator and has not yet been revised by the Commission.)

2.5 Conservation Management Plan

A Conservation Management Plan (CMP) for the place was unable to be identified during the preparation of this HIS.

3. Assessment of impact

3.1 Proposed works

The proposed works comprise:

- Establishment of a disability accessible entrance to the lower ground floor through the Queen Street entrance.
- Modification of vaults in the basement, and addition of air-locks to both vaults.

3.1.1 Disability accessible entrance

To provide a disability complaint entrance to the building and lower ground floor, alterations are required to the building's Queen Street entrance, a new door opening from the foyer through to Tenancy 2 needs to be created, and finally, a DDA compliant ramp installed. Details of each of these is provided below.

Queen Street entrance

A threshold ramp will be installed over the single step at the exterior of the Queen Street entrance to address the level change. The current inward swinging entrance doors will be removed and rehung to swing outwards, and the main leaf will be swapped from the right hand door to the left hand door.

New door opening in Queen Street foyer

A new door opening will be made in the marble panelled dado on the northern side of the Queen Street entrance foyer through to Tenancy 2. It is observed that the marble panelling on the wall is 1960mm high. To comply with the National Construction Code, the opening height will need to be increased by 100mm to a total height of 2060mm. To achieve these complaint dimensions of the opening, further investigation of the structure is needed to be completed by a structural engineer (S&H Engineering) to confirm assumptions on the structural integrity of the existing structure. These investigations will be completed over two stages, as necessary, prior to the new opening being made and will be undertaken as follows:

- Stage 1 – proposed testing to determine beam structure:
 - Incrementally break out the concrete to expose the bottom flange of the beam and the connection of the web to the bottom flange.
 - The beam web is to be locally exposed where new steel sections are proposed to be added, to confirm feasibility of concept design.
 - Maximum extent of break-out anticipated to be 400mm tall x 100mm wide x 50% width of beam.
 - The beam to be made good following investigation by contractor with a repair mortar specified by S&H.

- Stage 1 – proposed testing to determine connection of beam to column:
 - Incrementally break out the concrete to expose the embedded steel / wrought iron beam and its connection to the existing column.
 - The beam to be made good following investigation by contractor with a repair mortar specified by S&H.
- Stage 2 – proposed testing to determine structural properties may include:
 - If mild steel or wrought iron beam is found embedded within concrete – concrete core sample of 25mmx25mm to confirm chemical composition of beam
 - If beam determine to be reinforced concrete – concrete core sample of the of the slab adjacent to the beam to determine concrete strength.

After the investigations are complete, the two design strengthening proposals provided by S & H Engineering will be assessed and the most appropriate option implemented. The two options both comprise beam strengthening and modification to allow for localised bottom flange removal and would involve the addition of either a mild steel beam or wrought iron beam to provide sufficient support for the new door opening.

DDA compliant ramp from foyer to lower ground floor

In Tenancy 2 the previous tenant's fit-out would be removed to facilitate the installation of a new DDA compliant ramp from the new opening to the tenancy. The ramp loading capacity is proposed to be limited to the structural capacity of the existing floor areas occupied and accessed by the ramp, which is anticipated to be 3kpa live load rating. The ramp would be enclosed by a fire rated partition wall for privacy. A new set of swing doors would be created at the base of the ramp to provide entry into the Tenancy 2 space.

3.1.2 Modification of vaults

This would include connection of two vaults together and installation of new secure locking system. Connection between adjoining vaults (Vaults 1 and 2) would be achieved through a new door opening in the shared wall. Existing bike racks would be removed.

Prior to the creation of a new door opening, structural investigation of the existing wall structure will be executed as follows:

1. Remove render locally from surface of wall beneath beam, to determine structural composition of wall.

2. Maximum area of removal = 500mm x 500mm.
3. Determine if the beam is supported by a loadbearing wall or by a perpendicular beam.
4. If supported by a perpendicular beam, determine its structural depth and whether the proposed opening clashes with the beam soffit.
5. If the beam soffit will interfere with the proposed opening locally remove the concrete cover on the beam soffit to determine if a mild steel / wrought iron section is embedded within it.
6. Maximum extent of invasive investigation to be similar to investigations of the beam between the foyer and Tenancy 2.

After the investigations are complete, the two design strengthening proposals provided by S & H Engineering will be assessed and the most appropriate option implemented.

The new locking system would involve the creation of a new internal cage, or airlock style partition, that can house the required contemporary locking system. The secure locking system would be placed inside Vault 1 and provide one singular secure entrance into both Vault 1 and Vault 2. The new secure locking systems would be fixed to the floor, and potentially walls, as necessary. The existing door to Vault 1 would be secured open, flat against the wall. The door to Vault 2 would be kept closed as per its existing locking mechanism.

3.2 Reason for the works

The proposed works are required for legislative compliance, and to enable Tenancy 2 and its associated basement space to be leased. The current access arrangements to the building and the lower ground floor of the Queen Street part of the building are not compliant with the Disability Discrimination Act 1992. An alternative arrangement is required to provide compliant accessible entry and egress to the building and the lower ground floor level. Without disability compliant access, the space cannot be properly utilised and tenanted.

Secondly, a connection between the two vaults and installation of a secure locking system is required to meet the proposed tenant needs and lease the space. The space is being leased to a secure storage company. The current vault security access relies on the existing vault door, which is outdated and does not provide the advanced security measures required for the prospective tenant. Also, the current vault arrangement is cumbersome and is not easily accessible. The vaults are accessed via stairs located near the entrance of Vault 1. Vault 2 is accessed from a separate adjoining room. Connecting the vaults together via a new opening and installing a single airlock for both vaults will provide easy access and use, as well as a consolidated security system for the prospective tenant.



Figure 16
Queen Street entrance, requiring threshold ramp and alteration of swinging doors.



Figure 17
Queen Street entrance foyer indicating location of proposed new door opening.



Figure 18
Vault 1, indicating location of proposed new opening.



Figure 19
Vault 2, indicating location of proposed new opening.

3.3 Impact assessment

Firstly, it is important to reiterate that the significance of the place is primarily associated with it being a fine example of Federation Gothic style, retaining many of its interior and exterior architectural features. However, the 1893 building is far more ornate in its design than the later 1903 section, to which the proposed works are contained. This is clearly demonstrated by the exterior and interior treatments of the two entrances. The Collins Street entrance, being the original entrance is grand in design to match that of its prominent location and the Federation Gothic style of the building. In comparison, the Queen Street entrance is far more modest and is the secondary entrance to the building, only servicing the smaller, rear portion of the building.

While both the lower ground floor and basement vaults of the 1903 section of the building contain original features, these are limited. The spaces have been heavily modified to support the ongoing use of the building and when assessing the significance of these spaces within the wider context of the building, it is clear that they are of contributory significance to the place's overall cultural heritage significance values. Additionally, the private nature of the basement vault space and its lack of aesthetic detailing, mean this space is likely to be of historical significance only.

3.3.1 Impacts on cultural heritage significance

This Section assesses the proposed works against Section 101(2)(a) of the Heritage Act 2017 – the extent to which the application affects the cultural heritage significance of the place or object.

The proposed works will have an overall negligible impact on the cultural heritage significance of the place. While there will be some minor physical and visual impact to the Queen Street entrance, proposed works are largely contained to previously modified spaces that are considered to be of contributory significance to the wider heritage place and will not impact on the cultural heritage values of the place.

Disability accessible entrance

Works to the Queen Street entrance will have a negligible impact on the place. The minor alterations to the entrance doors and the addition of a threshold ramp to the entrance's exterior will retain significant fabric and associated aesthetic values.

Introduction of a new door through the marble panelling of the north wall of the foyer would result in a minor physical

and visual impact. Structural investigation works will impact a small section of significant fabric, which will be made good after completion of the investigation works. The investigation works would also be contained to areas to be impacted by the proposed new door opening and any future structural strengthening works that may be required. Due to the detailing and placement of the panels with respect to the ground floor landing, the new door opening would not be able to be placed neatly within a single panel and would require a larger space. This would interrupt the panelling pattern in this location, similar to what has occurred with the existing door on the western foyer wall. The resulting cumulative visual impact to the Queen Street entrance foyer would be minor. While the marble panelling detail of the building's entrance foyers are considered of aesthetic significance, the proposed works would not remove the aesthetic nature of the marble panelling in the foyer. The remaining panelling would be clearly visible as the original aesthetic detailing, contemporary with the other architectural and aesthetic qualities of the Queen Street entrance foyer's interior space. Additionally, the Queen Street entrance foyer is secondary in design, location and significance to that of the Collins Street entrance foyer, which is outside the scope of these works.

Removal of seating and wall partitions installed by the previous tenant of Tenancy 2 will have no impact on cultural heritage significance. These items are not significant, and their removal will not impact significant fabric. Where fixtures affixed to significant fabric require removal, these will be made good. The proposed ramp will be a series of stand-alone structures that can be removed once no longer required. While minor fixings to the floor and walls may be required to secure the ramp in place, this would have no impact on cultural heritage significance as this area has already been previously modified by internal fit-outs several times over. As impact to significant fabric would be limited to minor fixings on the lower ground floor, this would have a negligible impact on the overall significance of the place.

Localising DDA compliant works to a secondary space of the building (i.e. Queen Street entrance), and to areas previously modified (Tenancy 2), mitigates any physical and visual impact, resulting in an overall negligible impact to the cultural heritage significance of the place.

Modification of vaults

Modification of vaults would have a negligible impact on the cultural heritage significance of the place.

The vault spaces have previously been highly modified. The vault doors have been replaced and are not original.

Building services, including fire protection services, lighting and air conditioning ducts run across the ceiling space, with bike racks, lockers and a compactus unit all currently located within the vault spaces.

Introduction of a new door opening in the shared wall between Vault 1 and Vault 2 would require a small section of significant wall fabric to be removed both for structural investigation works and for the new door opening. Structural investigation works would be made good after completion of the investigation works. The investigation works would also be contained to areas to be impacted by the proposed new door opening and any future structural strengthening works that may be required. The new opening would not diminish the significance of the vault spaces as their form and historical significance would remain unchanged and clearly readable. The two spaces would remain clearly distinct as two vaults, with their historical vault entrances intact. The new airlock with electronic locking system would reinforce the vaults' separation by having a separate entrance into each vault.

Additionally, while not original, the existing vault doors would remain in situ. The door to Vault 1 would be secured open against the wall, while the door to Vault 2 would be secured closed using its current mechanism. The new airlock would be a self-supporting structure, secured in place within Vault 1 through fixings to the floor and potentially the vault walls. These fixings would be minor and could be made good in future, when and if required.

Impact to significant fabric and alteration to the traditional vault layout has been mitigated by the existing heavily modified nature of the vault spaces, the private and inaccessible nature of the vaults, retention of non-original, yet traditional, vault doors, and the continued readability of the spaces as separate vaults; resulting in an overall negligible impact on the cultural heritage significance of the place.

3.3.2 Alternative proposals

This Section assesses the proposed works against Section 101(2)(a),(b),(d) and (f) and Section 101(3) of the Heritage Act 2017 – alternative proposals that were considered and reasons why these were dismissed.

Disability accessible entrance

The following options were considered and discounted:

- Not providing DDA compliant access to the building was considered and dismissed because providing DDA compliant access to the building, and Tenancy 2 is a

legal requirement. Under the terms of the DDA it is unlawful to discriminate against a person in many areas of public life, including employment, education, getting or using services and accessing public places, because of their disability. The building in its current form is discriminatory to people with a disability as they are unable to access the building.

- Replacing the existing ramp over the foyer stairs with a DDA compliant ramp was considered and discounted because it is physically impossible due to the size and layout restrictions of the foyer space.
- Leaving the doors with their existing swing and orientation was considered and discounted because the current arrangement poses a safety hazard. Entering from the righthand door places a person at the top of the ramp with no room to manoeuvre, whereas the balustrading on the lefthand side of the wall will act as a safety barrier. Also, the doors opening inward would block the proposed new door opening on the upper landing, obstructing users from accessing the door.
- A platform lift was considered instead of a ramp to the lower ground floor but was dismissed due to the increased complexity of installation and use. The user would require assistance to use the platform, and new stairs and handrail would also need to be installed adjacent to the platform lift for when the lift platform is not required. This option is also less reversible than the ramp proposed within this HIS.
- Providing DDA compliant access through the main Collins Street entrance was discounted because the change in level from the street to the foyer is so great that to comply with the requirement of AS1428.1-2009, works would result in an adverse physical and visual impact to the place through potential removal of stairs, addition of a platform lift to the main façade of the building or introduction of long ramp.

Modification of vaults

The following options were considered and discounted.

- Leaving the vaults as they are was considered and dismissed as the existing vault locking system is out of date and does not meet the requirements of the prospective tenant.
- Installing an airlock with electronic locking system to each existing vault entrance was considered and dismissed due to the added complexity of the design and use. A single airlock to the two vaults provides for easier access and use of the vault spaces.

3.3.3 Management of detrimental impacts

This section assesses the proposed works against Section 101(2)(f) of the Heritage Act 2017 – measures proposed to avoid, limit, or manage the detrimental impacts.

The proposed works would not have a detrimental impact on the cultural heritage significance of the place. The small scale and minor nature of the proposed works, together with their location in secondary and contributory spaces, would result in a negligible impact. This is partially due to careful consideration of design options to meet legislative compliance and the needs of the prospective tenant.

3.3.4 Australia ICOMOS Burra Charter

Since 2010 the Executive Director, Heritage Victoria and the Heritage Council Victoria have recognised *The Australia ICOMOS Charter for Places of Cultural Significance* (the Burra Charter) as the document guiding best practice heritage management in Victoria. The following articles are relevant to the works proposed in this HIS and are discussed accordingly.

Article	Comments
<p><i>Article 3 - Cautious approach</i></p> <p><i>3.1 Conservation is based on a respect for the existing fabric, use, associations and meanings. It requires a cautious approach of changing as much as necessary but as little as possible.</i></p> <p><i>3.2 Changes to a place should not distort the physical or other evidence it provides, nor be based on conjecture.</i></p>	<p>The proposed works align with this article in that they change as much as necessary but as little as possible to achieve the required outcomes that will enable DDA compliance and the space to be tenanted. They do not distort the physical evidence of the place or its associated significance.</p> <p>Works proposed to the entrance conserve significant fabric by retaining the existing doors, and preserve the streetscape of the building.</p> <p>Works proposed to the foyer for the establishment of compliant disability access require the proposed new door. Alternate options that avoid the creation of a new door are not possible due to the size and layout limitations of the space. However, creation of a new door would still enable the remaining panelling to be clearly visible as the original aesthetic detailing, contemporary with the other architectural and aesthetic qualities of the foyer's interior space.</p> <p>The proposed works to the vaults are necessary to meet the proposed tenant's requirements and create a more usable space. The new opening between the vaults would not diminish the significance of the vault spaces as their form and historical significance would remain unchanged and clearly readable. The two spaces would remain clearly distinct as two vaults, with their historical vault entrances intact. The new airlock would reinforce the vaults' separation by having an entrance into each vault.</p> <p>Significant fabric has been respected further through the use of structural investigations to ensure that the place is structurally suitable, or made suitable, to sustain the proposed works prior to works proceeding.</p>
<p><i>Article 7 - Use</i></p> <p><i>7.1 Where the use of a place is of cultural significance it should be retained.</i></p> <p><i>7.2 A place should have a compatible use.</i></p>	<p>The place was historically used as a financial institution, comprising office space and storage of valuables. This use has changed slightly over the years and the place is now primarily used as office space, and the vaults for general storage. The proposed changes would facilitate the continued use of the lower ground floor tenancy as office space and would reinstate the vaults' use as storage for valuables.</p>

Article	Comments
<p><i>Article 15 - Change</i></p> <p><i>15.1 Change may be necessary to retain cultural significance, but is undesirable where it reduces cultural significance. The amount of change to a place and its use should be guided by the cultural significance of the place and its appropriate interpretation.</i></p> <p><i>When change is being considered, including for a temporary use, a range of options should be explored to seek the option which minimises any reduction to its cultural significance.</i></p> <p><i>It may be appropriate to change a place where this reflects a change in cultural meanings or practices at the place, but the significance of the place should always be respected.</i></p> <p><i>15.2 Changes which reduce cultural significance should be reversible, and be reversed when circumstances permit.</i></p> <p><i>Reversible changes should be considered temporary. Non--reversible change should only be used as a last resort and should not prevent future conservation action.</i></p> <p><i>15.3 Demolition of significant fabric of a place is generally not acceptable. However, in some cases minor demolition may be appropriate as part of conservation. Removed significant fabric should be reinstated when circumstances permit.</i></p> <p><i>15.4 The contributions of all aspects of cultural significance of a place should be respected. If a place includes fabric, uses, associations or meanings of different periods, or different aspects of cultural significance, emphasising or interpreting one period or aspect at the expense of another can only be justified when what is left out, removed or diminished is of slight cultural significance and that which is emphasised or interpreted is of much greater cultural significance.</i></p>	<p>The proposed works align with this article in that the change is necessary, would have a negligible impact on cultural heritage significance, and contains aspects that area reversible.</p> <p>The proposed works are required, firstly, to meet compliance with the Disability Discrimination Act 1992, and secondly, to enable the spaces to be leased.</p> <p>The proposed works are minor in nature, being minimal changes to small, secondary or contributory spaces within the building, and would result in a negligible impact on the cultural heritage significance of the place.</p> <p>The new ramp proposed on the lower ground floor and the airlocks in the vault space are both reversible, with minimal repair works required on their removal.</p>
<p><i>Article 22 - New work</i></p> <p><i>22.1 New work such as additions or other changes to the place maybe acceptable where it respects and does not distort or obscure the cultural significance of the place, or detract from its interpretation and appreciation.</i></p> <p><i>22.2 New work should be readily identifiable as such, but must respect and have minimal impact on the cultural significance of the place.</i></p>	<p>The proposed works do not distort or obscure the cultural heritage significance of the place. The introduction of a new door in the foyer would not alter the function, use or layout of the space in any way that diminishes its cultural heritage value. The visual impact would be minimal and would not distort the architectural or aesthetic values associated with this contributory space.</p> <p>Similarly, connection of the two vaults would not impact the interpretation or readability of the vault spaces. The two spaces would remain clearly distinct as two vaults, with their historical vault entrances intact. The new airlock would reinforce the vaults' separation by having an entrance into each vault.</p> <p>Lastly, the new ramp proposed on the lower ground floor and the new airlock in the vault spaces are both reversible, with minimal repair works required on their removal.</p>

3.3.5 Principles for considering change to places on the Victorian Heritage Register

The Executive Director made and published a set of guiding principles under Section 19(1)(f) of the Heritage Act 2017 in December 2022 to inform statutory decision-making under Part 5 of the Act. The proposed works are consistent with these guidelines and discussed under each principle below.

Principle 1. Understand why the place is significant

As discussed in Section 2.4, the place is of historical, architectural, aesthetic and social significance. This significance is largely associated with the 1893 parts of the building. The proposed works are located in the later 1903 part of the building, specifically the foyer, Tenancy 2 on the lower ground floor and two vaults within the basement level. When assessing the significance of these spaces within the wider context of the building, they are of contributory significance to the place's identified cultural heritage values, with the basement vaults contributing to the place's historical significance only due to their form and function.

Principle 2. A cautious approach

In accordance with the Burra Charter (refer to Section 3.3.4), the cautious approach of doing as much as necessary but as little as possible has been undertaken by:

- Carefully considering the available options for providing disability compliant access.
- Upgrading the spaces only as much as necessary to meet modern requirements.
- Proposing reversible options of the new ramp and airlock system.
- Retaining significant fabric and Queen Street streetscape.
- Undertaking structural investigations to ensure the place is structurally able to support the works, and ensuring structural strengthening works are only undertaken as necessary.

Principle 3. Protect significant settings and views

The majority of works are limited to the interior of the place and, therefore, will not impact any significant settings or views associated with the place.

Works to the Queen Street entrance retain existing streetscape views and do not impact upon the significant setting of the building being located on the corner of Collins and Queen Streets diagonally opposite William Wardell's ES

& A Bank and William Pitt's Melbourne Stock Exchange and Melbourne Safe Deposit Building.

Principle 4. Respectful change and new built form

As discussed above, the proposed works to the place are respectful to the significance of the place in so that:

- They embody the articles of the Burra Charter (refer to Section 3.3.4).
- They enable safe, accessible and continued use of the space.
- New work is clearly identifiable as such and respects the cultural heritage significance of the place by minimising impact to the place.

Principle 5. Provide for upkeep

As discussed in Section 3.2, the proposed works are required for legislative compliance with the Disability Discrimination Act 1992, and to enable Tenancy 2 and its associated basement space to be leased by the prospective tenant.

The current access arrangements to the lower ground floor are not compliant with the Disability Discrimination Act 1992. Without disability compliant access, the space cannot be properly utilised and tenanted.

A connection between the two vaults and installation of an airlock is required for the proposed tenant's business activities. The current vault security access is outdated and does not provide the advanced security measures required by the prospective tenant. Also, the current access arrangements to the vaults are cumbersome. Connecting the vaults via a new opening will provide ease of access and use, as well as a consolidated security system. Therefore, proposed works in the vaults are required to meet the tenants needs and lease the space.

4. Conclusion

The proposed works are in keeping with the articles of the Burra Charter and would result in an overall negligible impact on the cultural heritage significance of the place.

The proposed works should be supported as they are required to meet legislative requirements of the Disability Discrimination Act 1992 and for the tenancy to be leased.

While there will be a minor physical and visual impact to significant fabric through removal of two small areas of wall and fixings to facilitate the works, these are minor in nature and limited to a small area within contributory spaces of the buildings, resulting in an overall negligible impact.

In summary, the findings of this HIS are that the proposed works would not have a detrimental impact on the cultural heritage significance of the place. On this basis, it is requested that a cultural heritage permit be granted and works be allowed to proceed with the following condition:

Condition 1 – Structural strengthening and modification works

Upon completion of structural investigations, the applicant will provide Heritage Victoria written notice of the proposed strengthening and modification works for endorsement, prior to further works proceeding.

